

1 IN THE DISTRICT COURT OF BECKHAM COUNTY
2 STATE OF OKLAHOMA

3 YANCY WALKER,
4 Plaintiff,

5 vs.
6 BETTY MOORE,
7 Defendant.

JAN 07 2015
BY DONNA HOWELL, COURT CLERK
DEPUTY

Case No. CJ-2015 - 2

8 **PETITION**

9 COMES NOW the Plaintiff, Yancy Walker and for her cause of action against the Defendant,
10 Betty Moore, alleges and states to this Honorable Court as follows:

11 **FIRST CAUSE OF ACTION**

12 1.

13 That the Plaintiff, Yancy Walker, is a resident of Roger Mills County, Oklahoma.

14 2.

15 Upon information and belief, that all times hereinafter mentioned, Defendant, Betty Moore
16 is a resident of Elk City, Oklahoma.

17 3.

18 That the accident hereinafter mentioned, occurred in Beckham County, Oklahoma, giving this
19 Court jurisdiction and venue.

20 4.

21 On or about the 8th day of February, 2013 at East Highway 66 in Elk City, Oklahoma, the
22 Defendant, Betty Moore negligently operated a motor vehicle causing an accident being driven by
23 the Plaintiff, Yancy Walker, who was traveling on said public highway. The Defendant, Betty Moore
24 failed to yield which caused his vehicle to collide with the Plaintiff's vehicle thereby causing an
accident.

25 5.

26 As a direct result of the Defendants negligence, Plaintiff sustained personal injuries resulting
27 in the following elements of damage: Both past, present and future pain and suffering, mental anguish,
28 medical expenses, wage loss, loss of earning capacity, permanent disability, disfigurement and loss

1 of quality and enjoyment of life. Due to her injuries, Plaintiff has been damaged in an amount in
2 excess of \$75,000.00.

3 6.
4

5 The Defendant's conduct amounted to reckless and willful disregard for the safety of the
6 Plaintiff and the Plaintiff is entitled to an award of punitive damages in an amount of excess of
7 \$75,000.00.

8 WHEREFORE, Plaintiff prays that this Court enters a judgment against the Defendant, Betty
9 Moore, for an amount in excess of \$75,000.00 together with an interest at a rate provided by law,
10 costs and reasonable attorneys fees and for such other and further relief which this Court deems just
11 and reasonable.

12 ALBERT & ALBERT
13

14 By:
15


16 Mark W. Albert, OBA #12575
17 P. O. Box 1748
18 Elk City, OK 73648
19 (580)-225-2010 Telephone
20 (580)-225-2011 Fax
21 ATTORNEY FOR PLAINTIFF
22
23
24
25
26
27
28